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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 21, 22, 23, and 25 of the Commission's Rules to Require Reporting of Station Frequency and Technical Parameters for Registration by the Commission with the International Frequency Registration Board	)	CC Docket No. 92-160

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FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF
GE AMERICAN COMMUNICATIONS, INC.

GE American Communications, Inc. ("GE Americom") hereby comments on the Commission's proposal inm the above-referenced docket to create an automated database, based upon submissions from licensees, which will provide the Commission with the information necessary to protect domestic licensees from the risk of harmful electrical interference from foreign carriers and to improve the reporting of frequency assignments to the International Frequency Registration Board ("IFRB"). GE Americom is a pioneer in domestic communications satellites authorized by Part 25 of the Commission's rules, with a current fleet of five operating C-band satellites, soon to be augmented by two more, and two in-orbit Ku-band satellites, all of which provide a broad array of communications services to customers.

Because of the crippling harm that interference from foreign sources can inflict on domestic communications satellites and the potential for the disruption of customers' services on these satellites, GE Americom supports all reasonable efforts by the

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Commission to facilitate international management and coordination, with other countries, of spectrum. For this reason, GE Americom therefore endorses the Commission's proposals. Although GE Americom does not keep the information specified in the Notice of Proposed Rulemaking ("Notice") in a consolidated form, it is willing to provide the Commission with accurate and properly formatted data deemed necessary for the creation and updating of an automated database necessary that will enable the Commission to meet IFRB notification requirements, to respond to IFRB requests and publications and to respond appropriately to foreign countries' requests for frequency assignments.

GE Americom's concerns in this proceeding are therefore limited to the format in which the requested information is presented and the timing within which the requirement to submit information will be implemented.

The Commission Should Specify a Commercial Database Program

As far as format is concerned, GE Americom would like to comment on the Commission's proposal that the type of file in which information should be contained and formatted consist of a plain, or "flat" ASCII file. It is not likely that data in such a format, in and of itself, would be of significant value to the Commission's stated purposes of discharging its international responsibilities, since the volume of such information and its range will be so great that it is virtually certain that the

Commission would have to employ an electronic database management program to sort, manipulate and retrieve selected data to meet its responsibilities in international frequency coordination.

Given the necessity of some sort of database program, GE Americom believes that the Commission should specify an off-the-shelf MS-DOS compatible commercial database program that it will use, so that licensees can use the same program to input their data and submit it to the Commission.[1] Both Dbase and Paradox are database management programs that have been widely accepted by industry and are powerful enough for the Commission to use to manage its database, yet sufficiently user-friendly so as to be used even by smaller licensees. Therefore, either program could be specified as the one the Commission will use. Other commercial programs may also meet these criteria and thus would be similarly acceptable.

The use of a widely accepted and powerful off-the-shelf database management program would simplify initial system development on the part of many licensees, such as GE Americom, which does not as yet compile the information sought by the Commission in electronic form. This would allow them to develop

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[1] Of course, if the Commission itself or any licensee has already developed a database program that attains or exceeds the power and user-friendliness of the leading commercial programs, and the Commission adopts its format, it should be distributed to licensees as soon as possible so that they may input their data accordingly.

a system of recording information in accordance with a program that has met the marketplace tests in terms of power and ease of use, so that clerical data entry personnel could input data in a relatively error-free way.[2] By comparison, GE Americom believes that the use of the same personnel to compile data in a flat ASCII file would require greater efforts in proofreading and cross-checking on the part of licensee management and Commission staff and thus would involve delay in the Commission having available the information it needs.

Specification of a standard database program would also permit uniform data entry and ensure compatibility across various computer systems, since at the most popular commercial programs are available for MacIntosh operating systems as well as for MS-DOS. This would allow for relatively simple system-to-system importing of licensee data to the Commission's database. In addition, a standard system would allow for changes in format, such as a greater number or lesser number of characters in a field, which may be necessary to respond to potential changes in the IFRB's requirements or for other unforseen purposes.[3] This is virtually impossible for flat ASCII file data, since severe

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[2] In addition to a significant initial submission, GE Americom foresees the need to update the Commission's database continually, as licensees add, move, and modify their earth stations in response to consumer needs.

[3] For example, some of the information may be helpful to the Commission in resolving issues of domestic frequency coordination.

problems would be involved in making files submitted in a previous format consistent with new ones without having to redesign the entire system.

The Commission Should Establish
Reasonable Deadlines for Initial Data Submissions

GE Americom's second concern has to do with the timing within which initial data submissions must be made to the Commission, which will be quite extensive, capturing as these will the entire universe of licensed facilities and allied information the Commission needs to discharge its international responsibilities.

As previously mentioned, GE Americom keeps this information, but in a disaggregated form, and would have to design a new system from scratch. This is not a challenge to a company with the technical sophistication of GE Americom, but, even if a standard database management program is selected for GE Americom to use, there remains the matter of the time it would take for GE Americom and other licensees to gather and input data into this system. It must be kept in mind that the majority of Commission licensees for earth station equipment may be technically less sophisticated and may not even be aware of the pendency of this rulemaking and may have to be reminded of their responsibilities if the Commission adopts its proposal.

For this reason, after the Commission clarifies the issue of the program that it will use to manage its database, it should

give licensees up to six months or longer within which to make their data submissions. This should be sufficient for GE Americom to acquire the database program, gather information from various centers within the Company, and input all of this information for submission to the Commission.

Respectfully submitted,

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